UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JOE FASANO, et al.,

Plaintiffs,

Civil Action No. 16-cv-8759 (KPF)

-V.-

GUOQING LI, et al.,

Defendants.

DECLARATION OF GUOQING LI ON BEHALF OF KEWEN HOLDING COMPANY LIMITED

- I, Guoqing Li, under 28 U.S.C. § 1746, declare as follows:
- 1. I have knowledge of the matters set forth here through personal experience. If called to testify, I could and would testify to the truth of the following. I make this declaration in support of Defendants' Motion to Dismiss on *Forum Non Conveniens* Grounds.
- 2. I am the Director of Kewen Holding Company Limited ("Kewen Holding"). I have authority to make this declaration on behalf of Kewen Holding.
- 3. Kewen Holding is a limited company incorporated under British Virgin Islands law. Kewen Holding's business address is: Offshore Incorporations Limited, P.O. Box 957, Offshore Incorporations Center, Road Town, Tortola, British Virgin Islands.
 - 4. Kewen Holding's sole director resides in the People's Republic of China.
- 5. Kewen Holding's company files are located in the People's Republic of China. Kewen Holding does not have any offices, employees, operations, or company files in the State of New York or anywhere else in the United States.
- 6. Kewen Holding consents to jurisdiction in the Cayman Islands for the purposes of this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

Executed on February 22, 2017.

Gueling Li